

EXHIBIT 1



326 First Street, #202
Annapolis, Maryland 21403
info@tollefsonip.com

February 16, 2024

Greg Jordan
Jordan & Zito
350 North LaSalle Street
Suite 1100
Chicago, IL 60654

Via Email (gjordan@jz-llc.com)

Re: Misappropriation and Continuing Misuse by David Boshea and DJB & Associates LLC of Compass's Confidential Information and Trade Secrets

Dear Mr. Jordan,

As you know, my firm represents Compass Marketing, Inc. ("Compass"). I am writing to you today to address troubling issues with documents that you recently produced to Compass in the *David J. Boshea v. Compass Marketing, Inc.*, Case No. 1:21-CV-00309-ELH (the "Boshea Litigation").

Several of the documents produced appear on their face to include highly confidential and proprietary information of Compass, such as customer lists and financial reports. For instance, you produced email communications between Mr. Boshea and former Compass employees Michael White and Daniel White (brothers) dated May 29 and 30, 2024. Upon review of the communications, it appears Mr. Boshea solicited confidential Compass information from Michael and Daniel spanning the years 2006 through 2020. You were copied on some of these emails.

From the date and time stamps on the bottom of the documents, it appears that numerous highly confidential and proprietary Compass documents were accessed and printed on May 29, 2023, and then communicated to Mr. Boshea by Michael White within a few minutes later in an email titled "CMI Income." We have reason to believe that Mr. Boshea knows that Michael and Daniel White are former employees and are not entitled to this information, let alone to communicate it to Mr. Boshea. Mr. Boshea should also know that he is not entitled to this information.

Compass places significant value on its intellectual property, including its customer lists and financial information, which it goes to great lengths to maintain secret for an advantage against competitors. As you are certainly aware, Compass will vigorously protect its intellectual property rights, especially its trade secrets. The above-described information obtained by Mr. Boshea constitutes trade secrets within the meaning of the Defense of Trade Secrets Act ("DTSA") and the Maryland Uniform Trade Secrets Act ("MUTSA").



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Mr. Boshea's possession and use of this information each constitutes misappropriation under both the DTSA and the MUTSA. It is my understanding that Mr. Boshea is the CEO of DJB & Associates LLC, and that DJB & Associates LLC is attempting to compete with Compass in the marketplace. Therefore, Mr. Boshea's misappropriation appears to be for a commercial purpose.

I therefore demand that Mr. Boshea cease using Compass's trade secrets immediately. I demand that all copies of Compass customer lists, financial reports, and any other confidential documents obtained by Mr. Boshea, including any copies retained by you, be returned immediately; and that all digital copies be destroyed.

I also demand that you certify your compliance in writing and that no electronic or hard copies are in your or your client's possession, custody, or control.

If you fail to indicate your compliance by February 22, 2024, Compass will have no choice but to seek relief with the courts.

Compass reserves all rights, claims, and remedies.

Best Regards,

A handwritten signature in black ink, appearing to read "B. A. Tollefson".

Brian A. Tollefson

Cc: Thomas Gagliardo, Esq., Gilbert Employment Law
Judith Cornwall, Esq., Stein Sperling
Jeff Schwaber, Esq., Stein Sperling
Bruce Marcus, Esq., MarcusBonsib
Sydney Patterson, Esq., MarcusBonsib